

**Gravatt, Dan**

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**From:** Ruesch, Paul  
**Sent:** Monday, November 18, 2013 12:24 AM  
**To:** Nagel, Chris  
**Cc:** Schmidt, Aaron; Garoutte, Jonathan; dennis.wambuguh@health.mo.gov; Weber, Robert; Gravatt, Dan; Hammerschmidt, Ron; McKernan, John  
**Subject:** RE: County Wide- posting of documents  
**Attachments:** Isolation Break WP Request.pdf; OSC Approval Letter - Isolation Break WP.pdf; us epa iso break 61909.PDF; Countywide Landfill ib scenarion evaluation.doc; Isolation Break Issues for Work Plan.doc; Iso Break Construction Daily Discrepancy Log.doc; Isolation Break Daily Field Report Page 1 of 2 11.13.08.doc; Isolation Break Excavation Daily Field Report (page 2) 11.13.2008.doc; Waste Temperature Form.xls

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Hi Chris et al –

Attached are the relevant documents I discussed on Friday for your consideration with regards to the isolation break construction at Countywide.

Let me know if you have any questions or would like any clarifications.

One thing not on the "Isolation Break Issues for Work Plan" document that we learned was we needed to stage soil cover material along the perimeter (or sides) of the excavated waste fill area sufficient enough to push a 6" layer on top in the event of a surface fire contingency. We had a one break out when a mattress box spring laid on an exhaust pipe of an articulated dump all day and ended up smoldering undetected at the end of the day and then lighting up one of the tarps they were using to cover the working face each day. We had the night security guard driving by both the excavation and fill work face every ½ hour to check on things, and he called in a fire late one night. With the soil stockpiles there, we made quick work of the fire by firing up two of the D-8s and pushing the soil over the working face to snuff it out. Lost the tarps but no water used. Water is the very last thing you want to use.

I also added the daily forms we used each day for the field work, a discrepancy form if we had a difference of opinion on events taking place (never used this), and a waste temp tracking form for readings.

I hope this information is helpful. My next email will cover the OM&M plan.

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Paul Ruesch  
On Scene Coordinator  
U.S. EPA Region 5  
Superfund Division  
77 W. Jackson Blvd. (SE-5J)  
Chicago, Illinois 60604  
Office: 312-886-7898  
Cell: 312-919-4382  
ruesch.paul@epa.gov

**From:** Nagel, Chris [mailto:Christopher.Nagel@dnr.mo.gov]  
**Sent:** Friday, November 15, 2013 1:12 PM  
**To:** Ruesch, Paul  
**Cc:** Schmidt, Aaron; Garoutte, Jonathan; dennis.wambuguh@health.mo.gov; Nagel, Chris  
**Subject:** County Wide- posting of documents

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Superfund

Hi Paul,

Thank you again for your presentation this morning on your experiences at County Wide SLF in Sparta, Ohio. Please feel free to pass on my contact information as needed to enable the sharing of information between EPA and MDNR staff. As I mentioned this morning, I am very interested in any conditions you required in your letter to the facility, especially in regards to the barrier construction.

I am copying Aaron and DHSS staff as they are also interested in any documentation you can share.

Thank you.

**Chris Nagel**

**Director**

**Solid Waste Management Program**

**Missouri Department of Natural Resources**

**(573) 526-3900**

**(573) 526-3902**

**[chris.nagel@dnr.mo.gov](mailto:chris.nagel@dnr.mo.gov)**



**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
CLEVELAND OFFICE  
25089 CENTER RIDGE ROAD  
WESTLAKE, OH 44145-4170**

October 24, 2008

Republic Services of Ohio II, LLC  
c/o Michael Beaudoin  
3619 Gracemont Street S.W.  
East Sparta, Ohio 44626

**Re: U.S. EPA Request for Isolation Break Work Plan under Settlement Agreement No. V-W-08-C-897, for the Countywide Recycling and Disposal Facility, East Sparta, Ohio (Site ID# B5FC)**

Dear Mr. Beaudoin:

Pursuant to the authority vested in the On-Scene Coordinator (OSC) by the National Contingency Plan (NCP) and by Section XIV., paragraph 36 of the above-referenced Settlement Agreement, the United States Environmental Protection Agency (U.S. EPA) is formally requesting that Republic Services of Ohio II, LLC ("Republic") submit a work plan to construct a physical isolation break between Cells 5A/5B/4B and Cell 7 of the Countywide Recycling and Disposal Facility.

The purpose of the isolation break is to achieve a complete separation and full containment and isolation of the ongoing reaction currently affecting Cells 1-6. It is the understanding of U.S. EPA that Republic recently completed an "Isolation Break Investigation" into the feasibility of construction, which concluded that an isolation break could be constructed in a safe manner without significant impact on the community. Pending U.S. EPA's review of Republic's investigation report, and given the data recently collected by temperature probes in the Cell 5/7 border area, U.S. EPA's position is that the construction of a physical isolation break between Cells 5A/5B/4B and Cell 7 is additional Work, as defined by the Settlement Agreement and consistent with the NCP.

The following criteria should be taken into consideration in the development of the work plan:

- Control of odors which may affect the community,
- Safe and effective management of any leachate generated,
- Monitoring and control of emissions which may impact workers, and
- Prevention and control of conditions which may lead to a fire.

It is U.S. EPA's expectation that the work plan will address all pertinent aspects of the design, construction, environmental controls, waste relocation, compliance issues, and any contingencies associated with the isolation break.

Prior to formal submission of a work plan pursuant to this request, U.S. EPA, in conjunction with Republic, will schedule a meeting with representatives of the Ohio EPA, Stark County Health Department and Canton City Health Department to review a conceptual work plan and ensure that it takes into consideration all applicable or relevant and appropriate requirements (ARARs). It is U.S. EPA's expectation that, to the extent feasible, all ARARs will be adhered to in the design, construction, and completion of the isolation break.

Please notify me of the availability of the conceptual work plan as soon as possible. You may post the document and any related attachments or appendices to the Site's FTP site for review prior to the meeting.

Thank you very much for your cooperation and desire to see the isolation break initiated and concluded as safely and expeditiously as possible. If you have any questions, please feel free to contact me at (440) 250-1742.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Augustyn", with a horizontal line extending to the right. Below the signature, the letters "FOR" are handwritten in a smaller, stylized font.

James E. Augustyn  
On-Scene Coordinator

cc: Ed Gortner, Ohio EPA, Columbus, OH  
James Morris, USEPA, Reg. V, ORC  
Paul Ruesch, USEPA, Reg. V, LCD  
Michelle Colledge, ATSDR  
Records Center, USEPA, Reg. V



**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
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CLEVELAND OFFICE  
25089 CENTER RIDGE ROAD  
WESTLAKE, OH 44145-4170**

**November 19, 2008**

Republic Services of Ohio II, LLC  
c/o Michael Beaudoin  
3619 Gracemont Street S.W.  
East Sparta, Ohio 44626

**Re: U.S. EPA Approval of Isolation Break Excavation Work Plan under  
Settlement Agreement No. V-W-08-C-897, for the Countywide  
Recycling and Disposal Facility, East Sparta, Ohio (Site ID# B5FC)**

Dear Mr. Beaudoin:

The United States Environmental Protection Agency (U.S. EPA) has completed its review and hereby grants approval of the "Isolation Break Excavation Work Plan - Countywide Recycling and Disposal Facility," prepared by Earth Tech | AECOM, submitted on 11/14/08.

The goal of this work is to achieve a complete separation, full containment and isolation of the ongoing reaction currently affecting Cells 1-6. U.S. EPA's position is that the construction of an isolation break between Cells 5A/5B/4B and Cell 7 is additional Work, as defined by the Settlement Agreement and consistent with the National Contingency Plan.

During construction of the isolation break, Republic Services of Ohio II, LLC and/or its contactors must maintain the following:

- Control of odors which may affect the community,
- Safe and effective management of any leachate generated,
- Monitoring and control of emissions which may impact workers, and
- Prevention and control of conditions which may lead to a fire.

U.S. EPA and/or its representatives will be present on site to oversee implementation of the work plan. If at any time it is determined that the above conditions are not being met, U.S. EPA may order suspension of construction activities until corrective actions are made.

Thank you very much for your cooperation and desire to see the isolation break constructed as safely and expeditiously as possible. If you have any questions, please feel free to contact me at (440) 250-1742.

Sincerely,

  
James E. Augustyn  
On-Scene Coordinator

cc: Ed Gortner, Ohio EPA, Columbus, OH  
Kurt Princic, Ohio EPA, Twinsburg, OH  
James Morris, USEPA, Reg. 5, ORC  
Paul Ruesch, USEPA, Reg. 5, LCD  
Michelle Colledge, ATSDR  
Records Center, USEPA, Reg. V



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**77 WEST JACKSON BOULEVARD**

**CHICAGO, IL 60604-3580**

REPLY TO THE ATTENTION OF:

**LM-8J**

**June 19, 2009**

**Republic Services of Ohio II, LLC  
c/o Michael Beaudoin  
3619 Gracemont Street S.W.  
East Sparta, OH 44626**

**Re: Isolation Break - Countywide RDF, East Sparta, Ohio (Site ID# B5FC)**

**Dear Mr. Beaudoin:**

Thank you for your cooperation in the construction of the isolation break between Cells 4B/5B/5C and Cell 7 at the Countywide Landfill. The United States Environmental Protection Agency (U.S. EPA) appreciates your attention to this effort as well as the resources dedicated to the project over the past several months to complete it on schedule and with no accidents.

The goal of this project was to isolate and contain the reaction impacting Cells 1-6 to within the 88 acre remediation area. U.S. EPA and/or our designated contractor were present on site to conduct oversight through the duration of the project. It was documented that all waste was excavated down to the bottom liner atop the berm separating Cells 4B/5B/5C from Cell 7, achieving a total separation of the waste contained in these respective cells. Further, the U.S. EPA documented that the bottom of the isolation break was constructed in a manner that would effect total separation of leachate and gas between Cells 4B/5B/5C and Cell 7. U.S. EPA documented the integrity of the bottom liner as well as all repairs made prior to construction of the roadway separating the Cells.

During this excavation, there was no evidence found of reaction, pyrolysis or fire in the waste or bottom liner separating the Cells. Approximately 70 cubic yards of secondary aluminum wastes (mostly reacted baghouse dust found in supersacks) were uncovered along the Cell 5 side slope and were disposed of within the 'bowl area' of the 88 acres.

Daily reports were completed in coordination with the construction quality assurance contractor and submitted each day throughout the project. Monthly progress reports were submitted on time throughout the duration of the project.

(over)

Thank you very much for your cooperation on the isolation break project. Please feel free to contact me at (312) 886-7898 should you have any questions about this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Ruesch".

Paul Ruesch  
Environmental Engineer

cc: Kurt Princic, OEPA, Twinsburg, OH



**Countywide Landfill**  
**Scenario Evaluation**

**Option 1. Continue w/ Gas Break**

- Pros:** Contemplated by original AOC  
Non-intrusive and less likely to generate odors, near term community impacts  
FML and gas wells, temp probes, monitoring in place (some need replacement)
- Cons:** Gas break may not control reaction/fire (could affect Cells 7/8A)  
Cell 8A/8B isolation break not constructed to specification (combustible matls)  
May require future revision to AOC to 'annex' Cells 7/8A into AOC

**Option 2. Excavate Isolation Break**

- Pros:** Pro-active and preventative action  
Higher assurance to isolate and contain reaction/fire to 88 acres of Cells 1-6  
Support from state, facility, community, local officials  
Authority exists within AOC to order and oversee  
Existing work plan (10/07) and HASP (12/07) already proposed
- Cons:** May generate odors and elevated risk of impacts (fire, leachate, emissions)  
Challenge to construct (time required, winter conditions)  
Disposition of waste is state issue  
May encounter aluminum wastes in area to be excavated

### Isolation Break Issues

1. Compliance issues (permits, notifications, approvals, etc)
2. Gas system tuning
3. Slope stability during excavation
4. Structural integrity of existing berm
5. Design drawings (final slopes, toe drains, leachate, gas)
6. Waste revision / screening protocol
7. Hazardous waste contingency (drums, super sacks, dross, asbestos, etc)
8. Air monitoring (equipment cabs, working face(s), perimeter, community, dioxin sampling)
9. Odor monitoring (community)
10. Waste relocation (location, isolation, ability to monitor independently, transport)
11. Work hours (cessation over holidays, hours)
12. On site odor control measures (mistlers, trailers, blowers)
13. Blowing litter control
14. Run-on / Run-off control, drainage
15. Daily cover
16. Fire / explosion contingency plan
17. Leachate management / treatment
18. OSHA compliance (PPE, monitoring, action levels, protocols, HAZWOPR training for operators?)
19. Temporary relocation of residents
20. Outreach and communications to public
21. Fire suppression plan (OEPA comments?)

CWRDF Isolation Break Construction  
Discrepancy Identification Log

Date:	Discrepancy:	Parties:	Resolution:
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**Isolation Break****Daily Field Report**

Owner: Republic Waste Services of Ohio, II

Report No.: \_\_\_\_\_

Shift: \_\_\_\_\_

Location: East Sparta, Ohio

Date: \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

Project: CWRDF Isolation Break

Weather: A.M. \_\_\_\_\_ P.M. \_\_\_\_\_

Excavation Contractor: \_\_\_\_\_

Temp.(°F): High \_\_\_\_\_ Low \_\_\_\_\_ Rain \_\_\_\_\_

Excavation Contractor Supt.: \_\_\_\_\_

Wind Direction: \_\_\_\_\_

PHSO: \_\_\_\_\_

Ambient Air Monitoring Tech: \_\_\_\_\_

Number and Function of Contractors' Personnel, Hours Worked (Identify Subcontractors Separately)

Contractor	No. of People	Major Constr. Equip. Description	Size/Capacity	No.	No. in Use

Observer(s)	Representing	Visitors	Representing

Volume of Waste Relocated: \_\_\_\_\_ Relocation Area/Cell: \_\_\_\_\_

General Location Within Area/Cell: \_\_\_\_\_

Aluminum Containing Waste Encountered: \_\_\_\_\_ If yes, Approximate Quantity and Condition: \_\_\_\_\_

Waste Impacted by Reaction Encountered: \_\_\_\_\_ If yes, Approximate Quantity and Condition: \_\_\_\_\_

Highest VOC Reading (downwind station): \_\_\_\_\_ Time: \_\_\_\_\_

Highest VOC Reading (breathing zone): \_\_\_\_\_ Time: \_\_\_\_\_

Signature: \_\_\_\_\_

Owner: Republic Waste Services of Ohio, II

Report No.: \_\_\_\_\_ Shift: \_\_\_\_\_

Project: CWRDF Isolation Break

Date: \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_

Problems Encountered and Remedies: \_\_\_\_\_

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Additional Comments: \_\_\_\_\_

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Signature \_\_\_\_\_